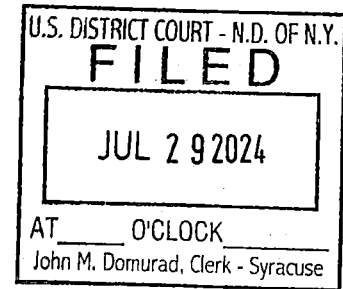


UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

KAMAR L. BOATMAN SR.,)
)
 Plaintiff,)
)
 v.) Case No. 5:18-CR-185(NAM)
)
 SYRACUSE POLICE DEPARTMENT,)
)
 Defendant.)



COMPLAINT FOR DAMAGES

Plaintiff, Kamar L. Boatman Sr., for his Complaint against Defendant Syracuse Police Department, states and alleges as follows:

INTRODUCTION

1. Plaintiff Kamar L. Boatman Sr. is a resident of [Plaintiff's Address].
2. Defendant Syracuse Police Department is a municipal law enforcement agency located at 515 South State Street, Syracuse, New York.
3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 (federal question jurisdiction) and 42 U.S.C. § 1983 (civil rights violation).
4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) as the events giving rise to this action occurred in Syracuse, New York.

FACTS

5. On May 31, 2018, the Syracuse Police Department executed a search warrant at the residence of Plaintiff Kamar L. Boatman Sr.
6. The search warrant affidavit, prepared by Detective Staub, alleged that Detective Staub conducted six controlled buys of crack cocaine from Plaintiff.
7. Plaintiff was subsequently arrested based on the evidence obtained from the search warrant.
8. Upon investigation, it was discovered that no controlled buys had occurred, rendering the search warrant invalid and the search illegal.
9. During the prosecution, Plaintiff, acting as his own attorney (pro se), requested the names of the officers involved in the controlled buys.
10. The prosecution responded that there were no names of officers present during the alleged controlled buys, further indicating that the controlled buys never took place.

CLAIMS FOR RELIEF

FIRST CAUSE OF ACTION

(Violation of Fourth Amendment - Illegal Search)

11. Plaintiff incorporates by reference the allegations in paragraphs 1 through 10.
12. The actions of the Syracuse Police Department, through Detective Staub, in securing a search warrant based on false information, violated Plaintiff's Fourth Amendment rights against unreasonable searches and seizures.
13. As a result of this illegal search, Plaintiff suffered damages, including but not limited to, emotional distress, loss of liberty, and reputational harm.

SECOND CAUSE OF ACTION

(Malicious Prosecution - Violation of Due Process)

14. Plaintiff incorporates by reference the allegations in paragraphs 1 through 13.
15. The initiation of criminal proceedings against Plaintiff based on false evidence constitutes malicious prosecution and a violation of Plaintiff's due process rights under the Fourteenth Amendment.
16. Plaintiff suffered damages as a result of this malicious prosecution, including legal costs, emotional distress, and loss of income.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that this Court enter judgment in his favor and against Defendant Syracuse Police Department, and award the following relief:

- A. Compensatory damages in the amount of \$2,000,000 to be paid within 30 days.
- B. An order requiring all Syracuse Police Department vehicles, including unmarked vehicles, to be equipped with GPS tracking devices.
- C. If Plaintiff is required to retain a lawyer and go public with this corruption, he will seek \$20,000,000 in damages.
- D. Costs and expenses of this action, including attorney's fees.
- E. Any other relief the Court deems just and proper.

Dated this 1st day of July, 2024.


Kamar L. Boatman Sr.
124 Melbourne Ave
Entrepreneurklb@gmail.com

VERIFICATION

I, Kamar L. Boatman Sr., declare under penalty of perjury that the foregoing is true and correct.

Executed on July 1st, 2024


Kamar L. Boatman Sr.

CC:
Mayor Ben Walsh
Syracuse Common Counsel